

NVB 4001 (Rev. 12/15)

## \* \* § 362 INFORMATION SHEET \* \*

Double Jump, Inc., et al. 19-50102 lead  
 DEBTOR BK- MOTION #:  
 International Speedway Corporation CHAPTER: 11  
 MOVANT

**Certification of Attempt to Resolve the Matter Without Court Action:**

Moving counsel hereby certifies that pursuant to the requirements of LR 4001(a)(2), an attempt has been made to resolve the matter without court action, but movant has been unable to do so.

Date: February 22, 2019

Signature: /s/ Mark R. Owens

Attorney for Movant

PROPERTY INVOLVED IN THIS MOTION: Subleases and Sponsorship Agreements

NOTICE SERVED ON: Debtor(s) ☒; Debtor's counsel ☒; Trustee ☐;

DATE OF SERVICE: February 22, 2019

**MOVING PARTY'S CONTENTIONS:**

The EXTENT and PRIORITY of LIENS:

1st Debtors not performing under Subleases

2nd Debtors not performing under Sponsorship Agreements

3rd \_\_\_\_\_

4th \_\_\_\_\_

Other: \_\_\_\_\_

Total Encumbrances: \_\_\_\_\_

APPRAISAL of OPINION as to VALUE:

**DEBTOR'S CONTENTIONS:**

The EXTENT and PRIORITY of LIENS:

1st \_\_\_\_\_

2nd \_\_\_\_\_

3rd \_\_\_\_\_

4th \_\_\_\_\_

Other: \_\_\_\_\_

Total Encumbrances: \_\_\_\_\_

APPRAISAL of OPINION as to VALUE:

**TERMS of MOVANT'S CONTRACT  
with the DEBTOR(S)::**

Amount of Note: Various Agreements

Interest Rate: \_\_\_\_\_

Duration: \_\_\_\_\_

Payment per Month: \_\_\_\_\_

Date of Default: January 1, 2019

Amount in Arrears: \$5,525,000

Date of Notice of Default: January 15, 2019

**SPECIAL CIRCUMSTANCES:**

3 Subleases: \$640,600 a month

8 Sponsor Agts. \$11,050,000 in 2019

SUBMITTED BY: International Speedway Corporation

/s/ Rick R. Hsu

**DEBTOR'S OFFER of "ADEQUATE  
PROTECTION" for MOVANT :**.  
.  
.  
.  
.  
.  
.**SPECIAL CIRCUMSTANCES:**

SUBMITTED BY: \_\_\_\_\_

SIGNATURE: \_\_\_\_\_

RICK R. HSU, ESQ.  
Nevada Bar No. 5374  
MAUPIN COX LEGOY  
4785 Caughlin Parkway  
Reno, Nevada 89519  
Telephone: (775) 827-2000  
Facsimile: (775) 827-2185  
Email: [rhsu@mcllawfirm.com](mailto:rhsu@mcllawfirm.com)

*Attorneys for International  
Speedway Corporation, et al.*

MARIA ELLENA CHAVEZ-RUARK, ESQ.  
*Pro Hac Vice Pending*  
SAUL EWING ARNSTEIN & LEHR LLP  
500 E. Pratt Street, Suite 900  
Baltimore, Maryland 21202  
Telephone: (410) 332-8600  
Facsimile: (410) 332-8862  
Email: [maria.ruark@saul.com](mailto:maria.ruark@saul.com)

MARK R. OWENS, ESQ.  
*Pro Hac Vice Pending*  
BARNES & THORNBURG LLP  
11 S. Meridian Street  
Indianapolis, Indiana 46204  
Telephone: (317) 236-1313  
Facsimile: (317) 231-7433  
Email: [mark.owens@btlaw.com](mailto:mark.owens@btlaw.com)

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In re

DOUBLE JUMP, INC.,

Debtor.

- ☐ Affects All Debtors
- ☐ Affects Double Jump, Inc.
- ☐ Affects Dora Dog Properties, LLC
- ☐ Affects Dog Blue Properties, LLC
- ☐ Affects Brandy Boy Properties, LLC
- ☐ Affects 475 Channel Road, LLC
- ☐ Affects Park Road, LLC
- ☐ Affects 140 Mason Circle, LLC
- ☒ Affects DC Solar Solutions, Inc.
- ☒ Affects DC Solar Distribution, Inc.
- ☐ Affects DC Solar Freedom, Inc.

Lead Case No.: BK-19-50102-BTB  
Chapter 11

Jointly Administered with:

19-50103-BTB	Dora Dog Properties, LLC
19-50104-BTB	Dog Blue Properties, LLC
19-50105-BTB	Brandy Boy Properties, LLC
19-50106-BTB	475 Channel Road, LLC
19-50108-BTB	Park Road, LLC
19-50109-BTB	140 Mason Circle, LLC
19-50130-BTB	DC Solar Solutions, Inc.
19-50131-BTB	DC Solar Distribution, Inc.
19-50135-BTB	DC Solar Freedom, Inc.

**Hearing: March 26, 2019 at 11:00 a.m.**  
**Judge: Bruce T. Beesley**

**MOTION FOR RELIEF FROM THE  
AUTOMATIC STAY OR, IN THE  
ALTERNATIVE, TO COMPEL REJECTION  
OF EXECUTORY CONTRACTS AND  
UNEXPIRED LEASES FILED BY  
INTERNATIONAL SPEEDWAY  
CORPORATION, ET AL.**

1 International Speedway Corporation (“ISC”) and its subsidiaries Phoenix Speedway, LLC d/b/a  
2 Phoenix International Raceway (now known as ISM Raceway); Darlington Raceway of South  
3 Carolina, LLC d/b/a Darlington Raceway; Daytona International Speedway, LLC d/b/a Daytona  
4 International Speedway; California Speedway Corporation d/b/a Auto Club Speedway; Richmond  
5 International Raceway, LLC d/b/a Richmond Raceway; Talladega Superspeedway, LLC d/b/a  
6 Talladega Superspeedway; Kansas Speedway Corporation d/b/a Kansas Speedway; and Michigan  
7 International Speedway, Inc. d/b/a Michigan International Speedway (collectively, the “ISC Entities”),  
8 by and through their undersigned counsel, file this Motion for Relief from the Automatic Stay or, in  
9 the Alternative, to Compel Rejection of Executory Contracts and Unexpired Leases (the “Motion”) in  
10 connection with the bankruptcy cases commenced by DC Solar Solutions, Inc. (“DC Solar”) and DC  
11 Solar Distribution, Inc. (“DC Distribution” and with DC Solar, collectively, the “Debtors”) for  
12 authority to immediately terminate or, alternatively, to compel immediate rejection of, the Subleases  
13 and Sponsorship Agreements (each as defined in the Memorandum). In support of this Motion, ISC  
14 and the ISC Entities refer to the Memorandum of Points and Authorities in Support of this Motion (the  
15 “Memorandum”)<sup>1</sup> and Declaration of Joel Chitwood in Support of this Motion (the “Chitwood  
16 Declaration”) which are incorporated herein by reference as if fully set forth at length. ISC and the  
17 ISC Entities respectfully state as follows:

18  
19  
20 This Motion is made and based upon the Memorandum, Chitwood Declaration, 11 U.S.C.  
21 §§ 105, 362(d) and 365(d)(2), and Federal Rule of Bankruptcy Procedure 4001. This contested matter  
22 is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (G). This Court has jurisdiction over  
23 this contested matter pursuant to 28 U.S.C. § 1334 and venue is proper before this Court pursuant to 28  
24 U.S.C. § 1409.

25  
26  
27  
28 <sup>1</sup> All capitalized, undefined terms set forth herein have the meanings ascribed to such terms in the Memorandum.

1 WHEREFORE, based upon the foregoing, ISC and the ISC Entities respectfully request that  
2 this Court grant ISC and the ISC Entities relief from the automatic stay for the purpose of allowing ISC  
3 and the ISC Entities to immediately terminate the Subleases and Sponsorship Agreements or,  
4 alternatively, to compel the Debtors to immediately reject the Subleases and Sponsorship Agreements,  
5 and for such other and further relief that is just and proper.  
6

7 Dated: February 22, 2019

/s/ Rick R. Hsu

RICK R. HSU, ESQ.

Nevada Bar No. 5374

MAUPIN COX LEGOY

4785 Caughlin Parkway

Reno, Nevada 89519

Telephone: (775) 827-2000

Facsimile: (775) 827-2185

Email: [rhsu@mcllawfirm.com](mailto:rhsu@mcllawfirm.com)

MARIA ELLENA CHAVEZ-RUARK, ESQ.

*Pro Hac Vice Pending*

SAUL EWING ARNSTEIN & LEHR LLP

500 E. Pratt Street, Suite 900

Baltimore, Maryland 21202

Telephone: (410) 332-8600

Facsimile: (410) 332-8862

Email: [maria.ruark@saul.com](mailto:maria.ruark@saul.com)

MARK R. OWENS, ESQ.

*Pro Hac Vice Pending*

BARNES & THORNBURG LLP

11 S. Meridian Street

Indianapolis, Indiana 46204

Telephone: (317) 236-1313

Facsimile: (317) 231-7433

Email: [mark.owens@btlaw.com](mailto:mark.owens@btlaw.com)

*Attorneys for International  
Speedway Corporation, et al.*

## CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Maupin, Cox & LeGoy and that on the 22<sup>nd</sup> day of Feb 2019, I caused to be served a true and correct copy of the within document in the following manner:

X (ELECTRONIC SERVICE) Under Administrative Order 02-1 (Rev. 8-31-04) of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by that Court's facilities.

☐ (UNITED STATES MAIL) By depositing a copy of the above-referenced document for mailing in the United States Mail, first class postage prepaid, at Las Vegas, Nevada, to the parties listed on the attached service list, at their last known mailing addresses, on the date above written.

☐ (OVERNIGHT COURIER) By depositing a true and correct copy of the above referenced document for overnight delivery via Federal Express, at a collection facility maintained for such purpose, addressed to the parties on the attached service list, at their last known delivery address, on the date above written.

☐ (FACSIMILE) That I served a true and correct copy of the above-referenced document via facsimile, to the facsimile numbers indicated, to those persons listed on the attached service list, on the date above written.

/s/Heather Motta  
Employee